



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
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November 26, 1997

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WALTER L. THOMAS, JR.
SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

In re: CC Docket 96-45, FEDERAL-STATE JOINT BOARD
ON UNIVERSAL SERVICE

Dear Mr. Caton:

Enclosed is an original and twelve copies of the Motion of the Alabama Public Service Commission for an Extension of Time to file Forward-Looking Economic Cost Studies in the above-referenced docket.

Please date stamp one copy and return it in the stamped, self-addressed envelope which is enclosed.

Sincerely,

John A. Garner
Administrative Law Judge

JAG:eml
Enclosures
by Federal Express

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12/1/97

Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of

Federal-State Joint Board
on Universal Service

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CC Docket No. 96-45

**MOTION FOR EXTENSION OF TIME
FOR FILING FORWARD-LOOKING ECONOMIC COST STUDIES**

The Alabama Public Service Commission ("APSC") respectfully submits this Motion for Extension of Time to File Forward-Looking Economic Cost Studies for purposes of federal universal service support. The APSC respectfully seeks an extension from February 6, 1998 to September 1, 1998. The APSC submits the following grounds in support of its request.

1. The APSC is the state agency in Alabama that is statutorily charged with the responsibility of regulating telecommunications common carriers providing service within the borders of Alabama. The APSC is, accordingly, required to take whatever measures are necessary to ensure the establishment of telecommunications services and facilities that further the public convenience and necessity. The APSC is also charged with the responsibility of ensuring that those services are furnished at rates that are just and reasonable.

2. Pursuant to Paragraph 248 of the Federal Communications Commission's ("FCC") Order No. 97-157 entered in the above-referenced Docket on May 8, 1997, state commissions were allowed to submit state-specific, forward-looking economic cost studies

for purposes of determining universal service support for their respective jurisdictions. States were required to notify the FCC of their election to submit such state-specific cost studies no later than August 15, 1997. Order No. 97-157 established that the state cost studies were to be filed with the FCC no later than February 6, 1998.

3. On August 13, 1997, the APSC promulgated an order in Docket 25980 which declared the intention of the APSC to develop Alabama-specific, forward-looking economic costing methodologies for purposes of determining universal service support for non-rural carriers in Alabama. The FCC was notified of the APSC's decision to develop a state-specific studies by correspondence dated August 13, 1997.

4. The APSC's election to develop state-specific costing methodologies for universal service purposes was predicated on concerns that an inaccurate determination of universal service costs specific to Alabama could have an adverse impact on universal service in Alabama. The APSC strongly believes that the use of state-specific data is critical to the furtherance of universal service regardless of the costing methodologies utilized.

5. The APSC currently has a proceeding underway to determine unbundled network element prices for BellSouth Telecommunications, Inc. ("BellSouth"). A proceeding to determine unbundled network element prices for GTE South, Inc. and Contel of the South, Inc. (collectively "GTE") is also scheduled. While a decision in the BellSouth proceeding is due to be rendered in the near future, such is not the case with the GTE proceeding. In fact, the GTE unbundled network element proceeding is not scheduled to commence until the first week of January, 1998. The delay in conducting these


proceedings is partly attributable to scheduling conflicts created by other proceedings related to the Telecommunications Act of 1996.

6. Due to the fact that the aforementioned unbundled network element pricing proceedings are not complete, the APSC has not yet attempted to conduct a proceeding for the determination of state-specific costing methodologies for universal service. Such a proceeding is, however, tentatively scheduled for the week of January 19 - 23, 1998. Given the magnitude of the matters to be considered in these proceedings, the deadline of February 6, 1998 cannot be met. An extension from February 6, 1998 until September 1, 1998 will, however, provide the APSC with the time that is needed to establish those studies. Such an extension will allow for the conclusion of the unbundled network element pricing proceedings and thereby afford the APSC an opportunity to establish costing methodologies for universal service purposes that are consistent with the costing methodologies established for unbundled network element pricing purposes. The importance of consistency between the costing methodologies developed for unbundled network elements and universal service was emphasized by the FCC at Paragraph 251 of its May 8, 1997 Order No. 97-157.

7. An extension of time from February 6, 1998 to September 1, 1998 will afford the APSC an opportunity to review the FCC's proposed cost model and input values prior to establishing Alabama-specific universal service costing methodologies. Affording the APSC such an opportunity will only enhance the quality of the cost studies that are submitted by the APSC and greatly increase the possibility that they will meet all guidelines established by the FCC.

Based on the foregoing, the APSC respectfully requests that the FCC grant its Motion for an Extension of Time to File Forward-Looking Economic Cost Studies from February 6, 1998 to September 1, 1998. This request is generally supported by the telecommunications industry representatives who have thus far participated in the universal service proceedings before the APSC, and is consistent with a similar request submitted by the National Association of Regulatory Utility Commissions which the APSC submitted comments in support of.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John A. Garner", is written over a horizontal line.

John A. Garner
Administrative Law Judge

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

**Federal-State Joint Board
on Universal Service**

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CC Docket No. 96-45

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion of the Alabama Public Service Commission for an Extension of Time for Filing Forward-Looking Economic Cost Studies has been furnished to the parties on the attached service list this 26th day of November, 1997.



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